

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THEIR
RESPONSE TO WAYMO'S PRECIS
LETTER REQUESTING PERMISSION
TO FILE MOTION FOR SUMMARY
JUDGMENT AND EXHIBITS THERETO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Uber Technologies, Inc. and
7 Ottomotto LLC’s Administrative Motion to File Under Seal Portions of Their Response to Waymo’s
8 Precis Letter Requesting Permission to File Motion for Summary Judgment and Exhibits Thereto (the
9 “Administrative Motion”). The Administrative Motion seeks an order sealing highlighted portions of
10 Defendants’ Response to Waymo’s Precis Letter Requesting Permission to File Motion for Summary
11 Judgment (“Uber’s Response”) and the entirety of Exhibits 1-10 thereto.

12 3. The portions of Uber’s Response marked in red boxes, the portions of Exhibits 1-2, 5,
13 and 7 highlighted in green, the entirety of Exhibits 6 and 8-9, and certain portions of Exhibit 10
14 contain or refer to confidential business information, which Waymo seeks to seal.

15 4. Uber’s Response (portions marked in red boxes in version filed herewith), Exhibits 1-2,
16 5, and 7 (portions highlighted in green in version filed herewith), and Exhibits 6 and 8-9 (entire
17 documents) contain, reference, and/or describe Waymo’s highly confidential and sensitive business
18 information. The information Waymo seeks to seal regards confidential analysis of Waymo’s
19 business and competition, including financial details and employee retention details. I understand that
20 this confidential business information is maintained by Waymo as secret. The public disclosure of
21 this information would give Waymo’s competitors access to in-depth insight into—and analysis of—
22 Waymo’s business strategy for its autonomous vehicle system. If such information were made public,
23 I understand that Waymo’s competitive standing would be significantly harmed. Exhibit 1
24 additionally contains, discusses, or refers to confidential details regarding the corporate ownership,
25 corporate leadership, business models, prototype development and testing, and employee recruitment
26 efforts of Kitty Hawk, which Waymo understands are highly confidential to Kitty Hawk, and
27 disclosure of such information would inflict serious and irreparable damage to Kitty Hawk’s business.
28 (See Dkt. 1115 ¶ 3.)

